

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF INVESTIGATION

Page 1 of 19

1. Program Code	2. Cross File <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Related Files	3. File No. [REDACTED]	4. G-DEP Identifier [REDACTED]
5. By: James W Graumlich, DI At: ORLANDO, FL DISTRICT OFFICE			6. File Title PUBLIX SUPERMARKETS, INC.	
7. <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared 05-15-2017	
9. Other Officers: DI Devonne West				
10. Report Re: Case Closing PUBLIX SUPER MARKETS, INC., 10400 Rocket Court, Orlando, Florida 32824; DEA #RP0500391 [REDACTED]				

A. SYNOPSIS:

This investigation was initiated pursuant to the Fiscal Year 2017 Regulatory Work Plan for the Miami Field Division, Orlando District Office, Diversion Group. PUBLIX SUPER MARKETS, INC. is currently registered with DEA #RP0500391 as a distributor in schedules II-V at 10400 Rocket Court, Orlando, Florida 32824. The company was previously registered as a distributor with a different DEA number at a different location. This is the first In-Depth investigation for their new DEA registration. The on-site inspection took place on 03-29-2017 and 03-30-2017. The follow up investigation, including verifications, ran through 05-15-2017

The in-depth investigation disclosed no significant record keeping violations. ARCOS records were reviewed prior to the on-site inspection and revealed no significant issues or violations. The firm uses CSOS to order schedule II controlled substances and to fulfill orders from its customers. As such, the firm's CSOS system and records were maintained corporately at its Lakeland, FL headquarters. Archived records for the orders selected for verifications were provided to DI Graumlich via e-mail and were considered readily retrievable.

Based on ARCOS records and a review of the firm's sales, DI Graumlich identified and audited the following 8 drugs:

Hydromorphone 8mg

11. Distribution: Division	12. Signature (Agent) James W Graumlich, DI	13. Date 05-15-2017
District	14. Approved (Name and Title) Linda A Stocum, GS	15. Date 05-18-2017
Other [REDACTED]		

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<p align="center">REPORT OF INVESTIGATION</p> <p align="center"><i>(Continuation)</i></p>	<p>1. File No.</p> <p align="center">[REDACTED]</p>	<p>2. G-DEP Identifier</p> <p align="center">[REDACTED]</p>
	<p>3. File Title</p> <p>PUBLIX SUPERMARKETS, INC.</p>	
<p>4.</p> <p>Page 2 of 19</p>	<p>6. Date Prepared</p> <p align="center">05-15-2017</p>	
<p>5. Program Code</p>		

Fentanyl 50mg

Suboxone 8/2mg

Testosterone

Alprazolam 2 mg

Tramadol ER 100mg

Lyrica 100mg

Promethazine with Codeine

The audit period ran from Close of Business 09-30-2016 to Close of Business 03-28-2017. The audit revealed no discrepancies.

The verification of controlled substance transactions was completed on 05-12-2017. Verifications were delayed due to the fact that Diversion Investigator Graumlich was involved in an administrative hearing in another case. No further action is necessary. This file is closed.

U.S. Department of Justice
Drug Enforcement Administration

<p align="center">REPORT OF INVESTIGATION <i>(Continuation)</i></p>	<p>1. File No. [REDACTED]</p>	<p>2. G-DEP Identifier [REDACTED]</p>
	<p>3. File Title PUBLIX SUPERMARKETS, INC.</p>	
<p>4. Page 3 of 19</p>	<p>6. Date Prepared 05-15-2017</p>	
<p>5. Program Code</p>		

B. ENCLOSURE PAGE:

1. Notice of Inspection
2. Computation Chart
3. Alarm Verification

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. [REDACTED]	2. G-DEP Identifier [REDACTED]
	3. File Title PUBLIX SUPERMARKETS, INC.	
4. Page 4 of 19	6. Date Prepared 05-15-2017	
5. Program Code		

C. BASIS FOR INVESTIGATION:

1. This investigation was initiated pursuant to the Fiscal Year 2017 Regulatory Work Plan for the Miami Field Division, Orlando District Office, Diversion Group. PUBLIX SUPER MARKETS, INC. is registered with DEA #RP0500391 as a distributor in schedules II-V at 10400 Rocket Court, Orlando, Florida 32824.

D. SUBJECT FIRM'S BACKGROUND:

2. PUBLIX was incorporated in the State of Florida in 1921 under document number 112252. The main branch headquarters office is located at 3300 Publix Corporate Parkway, Lakeland, Florida 33811. The following individuals were provided as corporate officers:

President/CEO Randall T. JONES, DOB: [REDACTED]
 Senior Vice President/General Counsel John A. ATTAWAY Jr., DOB: [REDACTED]
 Executive Vice President/CFO David P. PHILLIPS, DOB: [REDACTED]
 Vice President of Distribution Casey D. Suarez, DOB: [REDACTED]

A check in NADDIS revealed no derogatory information.

3. The distribution center supplies schedule II-V controlled substances to approximately 1,042 company-owned pharmacies located in six states; Florida, Alabama, Georgia, North and South Carolina, and Tennessee. The company was previously registered as a distributor of schedule III-V controlled substances with DEA number RP0331924 at 1950 Sand Lake Road, Building 3, Orlando, Florida 32809. This is the first In-Depth investigation for their new DEA registration and new location. PUBLIX is not currently under an MOU with DEA. This distribution center plans on expanding into the State of Virginia by July 2017.

4. PUBLIX holds the following licenses:

- State of Florida, Department of Business and Professional Regulation, Prescription Drug Wholesale Distributor, License #2220241, expiration June 30, 2017

U.S. Department of Justice
Drug Enforcement Administration

<p align="center">REPORT OF INVESTIGATION</p> <p align="center"><i>(Continuation)</i></p>	<p>1. File No.</p> <p align="center">[REDACTED]</p>	<p>2. G-DEP Identifier</p> <p align="center">[REDACTED]</p>
	<p>3. File Title</p> <p>PUBLIX SUPERMARKETS, INC.</p>	
<p>4.</p> <p>Page 5 of 19</p>	<p>6. Date Prepared</p> <p align="center">05-15-2017</p>	

- Orange County, FL licenses as a Distribution Center, 100 Employees, expiration 09-30-2017
- South Carolina Controlled Substances Act Certificate of Registration 40-16810 in schedules II-V, expiration 04-01-2018
- South Carolina Department of Labor, Licensing and Regulation, Board of Pharmacy Non-Resident Wholesaler, Distributor/Manufacturer Permit #16810, expiration 06-30-2017
- Alabama State Board of Pharmacy, Wholesaler Precursor License #700223, expiration 12-31-2017
- North Carolina Controlled Substances Registration Certificate #NC-DHHS-1000387, expiration 12-31-2017
- State of Georgia Department of Community Health, Wholesaler Pharmacy Permit #PHWH004035

It should be noted that the State of Tennessee advised PUBLIX that the firm did not require licensure, due to the fact that the distribution of prescription drugs from Publix wholesale distribution center in Florida to Publix retail pharmacies is considered an intracompany sale or distribution.

6. A check of DEA's databases revealed the following investigative history for the registrant under its current DEA registration:

- [REDACTED] Approval of Application

(The check also revealed the following history for the firm under its previous DEA registration:)

- [REDACTED] Approval of Application, Distributor in schedules III-V
- [REDACTED] Scheduled In-Depth, No violations
- [REDACTED] Scheduled In-Depth, No violations
- [REDACTED] Scheduled In-Depth, No violations

The distribution center operates with ninety-two full time employees. The firm's office hours are 2:20am to 3:30pm Sunday through Friday. Picking of controlled substances occurs between 4:30am and 1:30pm.

7. Suspicious Orders Reporting: Chris HEWELL, Manager for Procurement, explained the firm's system for identifying and reporting suspicious orders. It was explained that the system is programmed to establish a

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Drug Enforcement Administration

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	<p>3. File Title</p> <p>PUBLIX SUPERMARKETS, INC.</p>	
<p>4.</p> <p>Page 6 of 19</p>	<p>6. Date Prepared</p> <p align="center">05-15-2017</p>	
<p>5. Program Code</p>		

monthly threshold based on the customer's purchase history. Within the system, each order is analyzed by a program referred to as SOM/CSOS, which operates on an algorithm. If the customer exceeds a threshold, the over threshold amount is automatically omitted from the order. The system then generates an alert to the customer's pharmacy supervisor. The pharmacy supervisor conducts an investigation to determine if the order is suspicious. This investigation involves a review of the SOM/CSOS information, the customer's purchase history and dispensing activities. Following the investigation, the pharmacy supervisor places investigative notes in SOM/CSOS. If the pharmacy supervisor determines it is a suspicious order, the pharmacy supervisor reports the suspicious order to PUBLIX's Manager of Procurement, Pharmacist D, Chris HEWELL and Ms. SLONE. Mr. HEWELL and Ms. SLONE are responsible to report the suspicious order to DEA.

8. Mr. HEWELL stated that the firm has a threshold increase request process, which determines if an increase in threshold is necessary. All increases in thresholds are requested by a pharmacy supervisor. A history of any/all the threshold adjustments for each customer is maintained by the firm. Investigator Graumlich reminded Ms. SLONE and Mr. HEWELL that DEA does not approve or disapprove of a registrant's system of disclosing suspicious orders. The firm representatives were advised that the firm's system is required to be effective in reporting suspicious orders to DEA.

E. PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITY:

9. On 03-19-2017, Diversion Investigators (DIs) James Graumlich and Devonne West of the Orlando District Office presented their credentials to Compliance & Regulatory Manager Laura SLONE. DI Graumlich issued Ms. SLONE a DEA Form 82, Notice of Inspection (Notice). Ms. SLONE read the Notice pursuant to 1316.08(b) and signed it, thereby consenting to the inspection (Enclosure 1).

F. SCOPE OF INVESTIGATION:

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Drug Enforcement Administration

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	<p>3. File Title</p> <p>PUBLIX SUPERMARKETS, INC.</p>	
<p>4.</p> <p>Page 7 of 19</p>	<p>6. Date Prepared</p> <p align="center">05-15-2017</p>	
<p>5. Program Code</p>		

10. Prior to the on-site inspection, DI Graumlich obtained a certified ARCOS report from the Targeting and Analysis section of DEA Headquarters. This report showed all transactions reported by the firm and sales to the firm for the period in question. A review of these records revealed no suspicious transactions. The firm's ARCOS-reportable purchases trend towards oxycodone, hydrocodone and amphetamines.

11. The on-site portion of the in-depth investigation took place on 03-29-2017 and 03-30-2017. Diversion Investigators were assisted by Ms. SLONE, Armando PASCENCIA, Jason TARRATS and Chris HEWELL

12. Investigators chose the following controlled substances for the audit:

Hydromorphone 8mg

Fentanyl 50mg

Suboxone 8/2mg

Testosterone

Alprazolam 2 mg

Tramadol ER 100mg

Lyrica 100mg

Promethazine with Codeine

13. Each of the controlled substances audited balanced out with no discrepancies, shortages or overages. There was one issue with the fact that the firm's computer system will document an incorrect date of receipt on a usage printout if an item was listed on a purchase order (PO) that had items received on multiple dates. This is an on-going issue with the firm's computer system, but does not affect the accuracy or completeness on the actual DEA required record which is the hard copy invoice maintained scanned into the firm's database (See Discrepancies and

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Drug Enforcement Administration

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	<p>3. File Title</p> <p>PUBLIX SUPERMARKETS, INC.</p>	
<p>4.</p> <p>Page 8 of 19</p>	<p>6. Date Prepared</p> <p align="center">05-15-2017</p>	

Discussion with Management). Enclosure 2 is a copy of the computation chart. The audit period ran from Close of Business 09-30-2016 to Close of Business 03-28-2017.

G. RECORDKEEPING:

14. The firm maintains hard copy records on-site and digital records in its warehouse management system (WMS) known as "DALLAS". The firm's CSOS records are managed corporately at its Lakeland, FL headquarters. All CSOS records are available through the computers at the distribution center. Investigators reviewed the firm's DEA Initial Inventory which was taken on 07-18-2016. While the document did have the time printed on it, it did not indicate who took the inventory or whether it was taken at the beginning or close of the business day as required by 21 C.F.R. section 1304.11(a) (See Discrepancies and Discussion With Management).

1. Initial Inventory: The DIs chose the firm's close of business "cycle counts" dated 09-30-2016 for the Audit's Initial Inventory. The firm also conducts daily cycle counts based on product sales and receipts. All items with receipts or distributions from the previous day are counted and reconciled prior to shipping or processing for the day. Quarterly audits are also conducted by the audit department, which is located at the corporate office in Lakeland, Florida.
2. Closing Inventory: The DIs took a closing inventory as of the close of business on 03-28-2017. Their count was verified by Ms. SLONE and matched the firm's perpetual inventory for that day. 3 other controlled substances which were not audited were also counted as part of the inspection process.
3. Receipts: The firm's primary Schedule II receiving document is the CSOS record. All CSOS records are maintained in the firm's computer system at its Lakeland, FL headquarters, but are available at the registered location according to Chris HEWELL.

The firm's primary receipt record for schedule III-V controlled substances consists of a purchase order which includes all the information required by DEA. The purchase order contains the name of the firm, order number, quantity, product description and the date received. The actual date an item is physically received is documented on this record. The invoice is attached to all other paperwork pertaining to the purchase of controlled substances, including the firm's purchase order, the vendor's shipping list, a

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. [REDACTED]	2. G-DEP Identifier [REDACTED]
	3. File Title PUBLIX SUPERMARKETS, INC.	
4. Page 9 of 19		
5. Program Code	6. Date Prepared 05-15-2017	

freight bill prepared by PUBLIX and a freight log. The original purchase records for schedule III-V controlled substances are maintained on the premises.

The firm also maintains computer-generated transaction reports in its computer database. The transaction reports show the product name; strength; size; invoice and purchase order; quantity; date the purchase order was closed; transaction date; and store identification. Investigators used these computer printouts to assist in the audit, comparing purchases to the original paperwork to verify receipt dates.

All deliveries of controlled substances are scheduled ahead of time. The appointment times are logged into the computer system and can be viewed up to one week in advance. Delivery drivers check in at the guard shack upon arrival, security signs the individual in then issues a temporary badge. The driver proceeds to the parking area and presents the ID to the security officer. The security officer verifies the purchase order and calls a receiving associate. There is an assigned receiving door where the carrier is sent once verification is completed. The receiving associate checks the purchase order and escorts the driver at all times. When the controlled substance is received, one of the individuals with access to the controlled substances cage is notified. PUBLIX has assigned a receiving center operator to log controlled substances purchase order information into the computer system. The computer system lists the controlled substances based on NDC number. All damaged items discovered are placed in the quarantine cage pending final disposition. All received goods that are not palletized are placed in a rolling cage and transported to the control substances cage area. All palletized items are escorted to the cage immediately after processing by the receiving associate. Once the order is verified, the invoice is stamped with the actual date received. All controlled substances are listed on a separate purchase order. The firm conducts a daily cycle count on all items which had a sale or delivery on that date to verify receipt and distribution information.

4. Production Records: Nothing to Report.

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	<p>3. File Title</p> <p>PUBLIX SUPERMARKETS, INC.</p>	
<p>4.</p> <p>Page 10 of 19</p>	<p>6. Date Prepared</p> <p align="center">05-15-2017</p>	

5. Distribution Records: The firm's primary distribution record for schedule II drugs is maintained in the CSOS system. All CSOS records are maintained in the firm's computer system at its Lakeland, FL headquarters, but are available at the registered location according to Chris HEWELL.

The primary record for Schedule III-V distributions is the firm's computer generated invoice (pick slip) and the actual manifests, which are maintained by date and stored in the Information Services Department. All original hard copies go to the PUBLIX store the controlled substances are shipped to. The invoices are generated based upon computer orders transmitted to the Distribution Center from the individual pharmacies. According to Ms. SLONE, the firm verifies each customer's DEA registration prior to filling and processing an order. The firm's computer system will not generate an invoice if the DEA registration has expired. The DEA number and expiration date are printed on each shipping invoice.

All PUBLIX pharmacies use the firm's closed system, proprietary software to order controlled substances from the PUBLIX distribution center. The warehouse accepts or rejects the order from its stores. The firm generates pick slips via an interactive voice system used by warehouse personnel to fill orders. The distribution of each controlled substance is inventoried, cross checked and inspected prior to shipping. Each distribution is documented and tracked in the firm's computer system by item number. All controlled substances orders are pulled and checked by at least 3 individuals before being placed in totes and transferred to the shipping dock. The individuals are identified as a Selector, Order Checker and Dock Coordinator. All three individuals must verify the count before items are shipped.

Order pickers wear a wireless headset that is connected to a voice system. Once the picker receives the order, the computer generates a screen line for the same invoice. The picker logs on and begins picking. Once each item is picked it must be scanned by the picker and placed into a tote. If the item does not match the computer data, an error message is displayed and a voice message is relayed to the operator to choose the correct item. The scan code is based on the

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Drug Enforcement Administration

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. [REDACTED]	2. G-DEP Identifier [REDACTED]
	3. File Title PUBLIX SUPERMARKETS, INC.	
4. Page 11 of 19		
5. Program Code	6. Date Prepared 05-15-2017	

NDC number. The computer will not allow an invoice to be printed and closed until the error has been corrected. Orders are packed in a brown bag while in the cage but the box is not sealed until sent down the line to be boxed with non-controlled items. The shipping section closes all totes with a piece of PUBLIX security tape. Once the order is completed outside the cage an invoice is generated (computer invoice printed for the box). PUBLIX loads the totes containing controlled substances onto a short conveyor belt outside the controlled substances cage where the totes travel to the loading bays via the motorized conveyor belt system, stopping for verification in the distribution area. The conveyor belt is approximately 15 feet long and is within sight of operators. The single individual working in this area will not open any totes, but instead verify the label and order information on the outside of the tote against a printout. The totes are sent to the shipping department where they are sorted by route and funneled to the appropriate truck for delivery. Controlled substances totes do not sit on the loading bay. Every loading bay has cameras looking into the truck as it is loaded. The firm has a full time security staff monitoring the camera views. This information is digitally recorded and maintained for 60 days. When the semi-trailers are not being actively loaded and manned, the security door will be closed and locked. The firm utilizes a delivery truck service contracted through McKesson, Monday through Thursday. On Friday, the firm utilizes a third party carrier called Carrier Advertise Group. When goods are delivered, all loaded boxes will have the pharmacy designated on the box. A pharmacy associate must sign for the controlled substances. PUBLIX has made all carriers aware that all shipments should be delivered directly to the pharmacy. The driver obtains a signed freight log and delivery log from pharmacy personnel.

There were no theft or losses reported during the audit period. The firm is aware of the requirement to report any theft or loss of a controlled substance to DEA within 24 hours and to follow-up with a full report of the missing items via DEA's Theft or Loss system.

6. Records of Returned or Damaged Goods: Damaged or expired goods that are received from the supplier will be returned to the supplier

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	<p>3. File Title</p> <p>PUBLIX SUPERMARKETS, INC.</p>	
<p>4.</p> <p>Page 12 of 19</p>	<p>6. Date Prepared</p> <p align="center">05-15-2017</p>	
<p>5. Program Code</p>		

and a credit memo generated, or the products will be destroyed using an authorized destruction facility. The firm does not accept returns from their stores. All stores are internally equipped to handle the disposition of controlled substances in their possession. The return documents and credit memos are filed in the quarantine cage. The firm utilizes a quarantine cage to store substances that are in a holding status pending destruction or return.

7. ARCOS: The firm's Information Services Department is responsible for reporting to DEA's ARCOS system. Prior to the on-site inspection, DI Graumlich obtained an ARCOS transaction report from the ARCOS Targeting and Analysis section. According to Juanita Jones of the Targeting and Analysis Unit, There were no field problems or dosage unit or gram issues in the firm's reports and there were no Transaction Errors pending. A total of 1239 transaction lines were validated by the unit and used for purposes of the audit.

8. Quotas: Nothing to Report.

H. DRUG AND EQUIPMENT SECURITY:

15. PUBLIX is located in an industrial park area on the south side of Orlando, Florida. The firm is the only tenant, occupying 241,783 square feet, of a building equipped with a 35 foot ceiling. The building is constructed of tilted poured concrete panels with a metal correlated roof. The warehouse area consists of 231,779 square feet and the remaining square footage is designated as office space. The building is equipped with a mezzanine, which accounts for 54,409 square feet of the warehouse area and 7,355 square feet of the office area. This area is considered to be a low crime area. The Orange Co. Sheriff's Office is the responding law enforcement agency.

16. The firm's location is surrounded by a 10 foot galvanized chain link fence capped with a barb wire. The main entrance onto the property is through a security gate equipped with an intercom system. The intercom system is operated by the firm's security team. Visitors are identified and validated by the appropriate distribution center associate, prior granting access onto the property. Exterior cameras provide the security team with the ability to observe the visitor(s) from the perimeter entry gate to the main entrance to the building.

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	<p>3. File Title</p> <p>PUBLIX SUPERMARKETS, INC.</p>	
<p>4.</p> <p>Page 13 of 19</p>	<p>6. Date Prepared</p> <p align="center">05-15-2017</p>	
<p>5. Program Code</p>		

Exterior lighting is present on the building and parking area. The firm will have approximately 22 cameras to monitor and record exterior activities. Monitoring of the camera views and alarms are conducted at the 24/7 security office located on-premises. The recordings are archived for a 60 day period. Access to the building and specific areas are restricted by the use of an electronic key card system. If warranted, the firm can obtain a detailed report regarding the use of these key cards. Additionally, security team members conduct patrols and are equipped with radios for communication.

17. The main entrance to the building, which is a single glass panel door enclosed in a metal frame, is located on the east wall. This door is surrounded by glass panels enclosed in metal frames. This area is equipped with two glass breakage sensors. The east wall also consists of four exterior doors and eighteen metal overhead doors. The main entrance is utilized by all visitors and employees. The south wall consists of two exterior doors. The north wall has four exterior doors. The west wall consists of three exterior doors and nine metal overhead doors. All exterior doors, including the metal overhead doors, are equipped with a magnetic contact switch. Additionally, exterior cameras record and monitor these exterior doors.

18. The main entrance opens to enclosed lobby area equipped with an enclosed reception window. The reception window is manned by the firm's security teams. All visitors are required to present identification, logged in, obtain a visitor's badge and be escorted by an employee.

19. The warehouse area and office area are separated by interior doors equipped with the electronic key card and a magnetic contact switch. Access is restricted to only authorized personnel. There are a total of 12 long range motion detectors located throughout the interior of the firm. Additionally, the firm has approximately 85 internal cameras located in the warehouse area.

20. Prior to approval of the firm's registration at this location, it was determined that the thickness of the existing concrete slab for the vault floor was 5" thick. Ms. SLONE was advised that although DEA regulations require all vault floors to be constructed of "at least 8 inches of reinforced concrete or other substantial masonry, reinforced

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	<p>3. File Title</p> <p>PUBLIX SUPERMARKETS, INC.</p>	
<p>4.</p> <p>Page 14 of 19</p>	<p>6. Date Prepared</p> <p align="center">05-15-2017</p>	
<p>5. Program Code</p>		

vertically and horizontally with ½ inch steel rods tied 6 inches on center, or structural equivalent...". Prior to approval of their DEA registration, the firm identified that their floor did not meet these requirements so they had the floor broken up and replaced in the area of the vault. Upon completion, the firm provided a copy of a letter from Vice-President Gary Henkelman, Henkelman Construction, Inc., advising that the vault slab was installed with an 8" thickness with 4000 PSI concrete and #5 reinforcing steel at 6" on center in each direction. That letter was an attachment to the DEA 6 documenting approval of this registration.

21. Schedule II controlled substances will be stored in a UL rated Class M, five sided modular vault purchased and installed by VSI Vault Structures, 3640 Work Drive, Fort Myers, Florida. The vault occupies 4,480 square feet of the firm's warehouse area. The east wall of the vault has two Class M vault door, one measuring 144.5"H x 96 ¼"W Class M vault doors, which listed identification information: Class M, No. AOO# 292093, 12-31-2015 and the other measuring 78"H x 37"W, which listed identification information: Class M, No. AOO# 292094, 12-31-2015. Both of these doors utilize two Kaba Mas (Mas Hamilton) U.L. Listed Group 1A electronic Lock and are furnished with a self-closing, self-locking mesh day gate equipped with a magnetic contact switch. Additionally, there is an emergency exit Class M vault door measuring 78"H x 37"W, located on the north wall of the vault. This door is equipped with an interior emergency release and has no exterior lock or handle. This door listed identification information Class M, No. AOO# 292095, 12-31-2015. The vault is equipped with 6 cameras and 2 motion detectors.

22. Schedule III-V controlled substances will be stored inside a WireCrafters 840 Series cage, which occupies 8,960 square feet of the warehouse. The cage is constructed 2" x 1" rectangular woven 10 gauge wire mesh welded to 1 ¼" x 1 ¼" x 1/8 angle frame. The cage is mounted on 2" x 2" x 14 gauge steel tube posts. Base plates of 2" x 7" x ¼" steel flat with two 7/16" round holes for anchoring are welded to each tube. The steel posts are secured by bolts which are fastened to the concrete floor and ceiling. The west wall of the cage is bolted to the firm's vault. All other walls and doors of the cage are of the same material.

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Drug Enforcement Administration

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. [REDACTED]	2. G-DEP Identifier [REDACTED]
	3. File Title PUBLIX SUPERMARKETS, INC.	
4. Page 15 of 19		
5. Program Code	6. Date Prepared 05-15-2017	

The panels and posts are brazed, pinned to tack welded in place. The cage has two single self-closing and self-locking doors of the same material. Additionally, there is an automatic self-closing and self-locking double width door of the same material. All doors are protected with magnetic contact switches. The cage was equipped with six motion detectors and with five cameras.

23. The firm's alarm system was installed and is monitored by Tyco Integrated Security LLC, 10500 University Center Drive, Tampa, Florida 33612. The alarm system consists of a Bosch B440 Cellular Communicator as the primary means of communication accompanied by Telguard TG7 Cellular communicator. If an alarm or failure in communication occurs, the alarm company contacts the firm and law enforcement. Additionally, both systems are constantly supervised by the firm's on-site burglar alarm panel, which is manned by the firm's security personnel 24/7. The alarm panel initiates both an audible and visual alarm. In the event of power failure, the firm has a full capacity on-site generator to power the entire facility.

24. On 03-30-2017, Investigators Graumlich and West conducted an alarm test of the system. All breached devices were correctly identified by the Central Monitoring Station in a timely manner. A copy of the firm's alarm contract with documentation of the results of the test are included as Enclosure 3.

25. The following individuals have access to the controlled substances:

Laura SLONE	Manager
Amado PLASCENCIA	Superintendent
Jason TARRATS	Supervisor Warehouse
Bill PELHAM	Operation Mgr
Alex HAAS	Supervisor
Mark SHAIYA	Manager



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Drug Enforcement Administration

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. [REDACTED]	2. G-DEP Identifier [REDACTED]
	3. File Title PUBLIX SUPERMARKETS, INC.	
4. Page 16 of 19		
5. Program Code	6. Date Prepared 05-15-2017	

John SANTIAGO	Lead
Jasmine RODGRIQUEZ	Inventory
Bradley BENNETTS	Inventory
Janine LOCKHART	Motor
Nyree BRAGG	Motor
Zeljko RADMONOVIC	Selector
Omari LAWSON	Selector
Alexander GRIGGS	Selector
Tisha CAMPOS	QC checker
William PERRY	QC checker
Leon JENKINS	QC checker
Sandra MILLER	Stocker
Tony ESTEVEZ	Warehouse person
Cecelia BOAST	Warehouse person
John TARR	Warehouse person

A NADDIS check revealed no derogatory information.

PUBLIX corporate office conducts all reference and background checks on prospective employees. If successful, the applicant is referred to the corporate office for further review. All employees are subject to random drug screens.

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Drug Enforcement Administration

<p align="center">REPORT OF INVESTIGATION</p> <p align="center"><i>(Continuation)</i></p>	<p>1. File No.</p> <p align="center">[REDACTED]</p>	<p>2. G-DEP Identifier</p> <p align="center">[REDACTED]</p>
	<p>3. File Title</p> <p>PUBLIX SUPERMARKETS, INC.</p>	
<p>4.</p> <p>Page 17 of 19</p>	<p>6. Date Prepared</p> <p align="center">05-15-2017</p>	

I. INTELLIGENCE INFORMATION:

26. The firm had no information to report concerning trends or other intelligence.

J. FOREIGN SUPPLIERS AND CUSTOMERS:

27. The firm had no foreign suppliers or customers.

K. DISCREPANCIES AND DISCUSSION WITH MANAGEMENT:

28. On 03-30-2017, Diversion Investigators James Graumlich and Devonne West discussed the results of the on-site inspection and audit with members of Publix management team. Present for Publix were: Laura SLONE, Chris HEWELL, Superintendent Armando PASCENCIA and Jason TARRATS, Front-Line Supervisor. DI Graumlich pointed out that, while the firm's Initial Inventory did have the time the count was taken, that did not clarify whether the count was taken at the beginning or end of the business day as required by the Code of Federal Regulations. He reminded Ms. SLONE that the firm's Biennial Inventory should be appropriately annotated and she said she understood. DI Graumlich also pointed out that the firm's system of updating the receiving date for all items on a purchase order where the items were received on different dates leads to inaccurate receiving dates being documented on some of the printouts the firm offers Investigators during the reconciliation of their records. The firm's practice of "line item" receiving updated all of the received items with the most recent date an item was received thereby listing items as received during an audit period when in reality the item was received prior to the audit period. Investigators are reminded to look to the firm's actual physical documents when trying to resolve any discrepancies during an audit. The firm's purchase orders accurately document the date items were received and placed into stock.

L. VERIFICATIONS:

29. Subsequent to the on-site inspection, DI Graumlich verified the following invoices:

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Drug Enforcement Administration

REPORT OF INVESTIGATION (Continuation)	1. File No. [REDACTED]	2. G-DEP Identifier [REDACTED]
	3. File Title PUBLIX SUPERMARKETS, INC.	
4. Page 18 of 19		
5. Program Code	6. Date Prepared 05-15-2017	

Invoice #287030640, dated 03-27-2017 was verified with Diana Manown, Lead Pharmacy Technician.

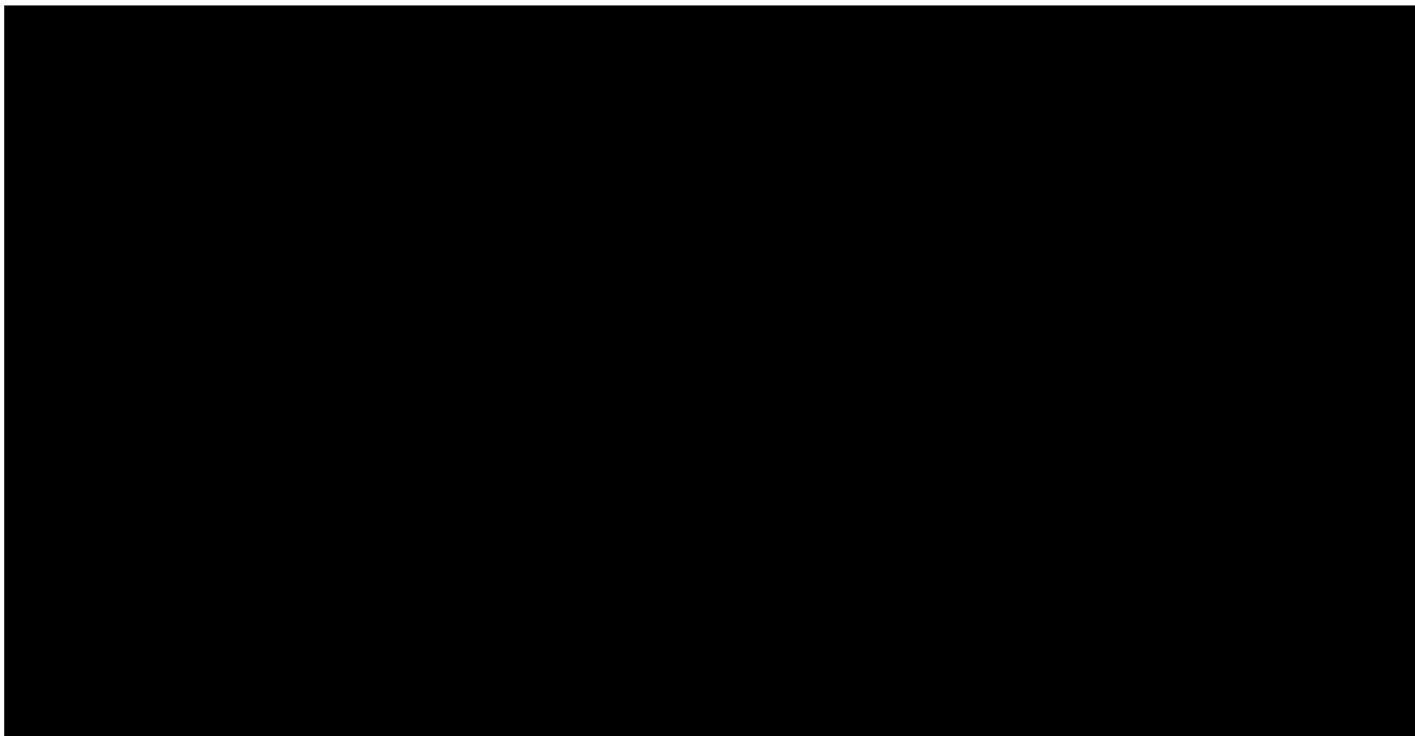
Invoice #284553210, dated 03-01-2017 was verified with Cindy McDonald, R.Ph.

Invoice #272871023, dated 10-24-2016 was verified with Pryianka LNU, Pharmacy Technician.

M. SPECIAL ASSIGNMENTS:

30. Nothing to Report.

INDEXING:



DEA Form - 6a
(Jul. 1996)

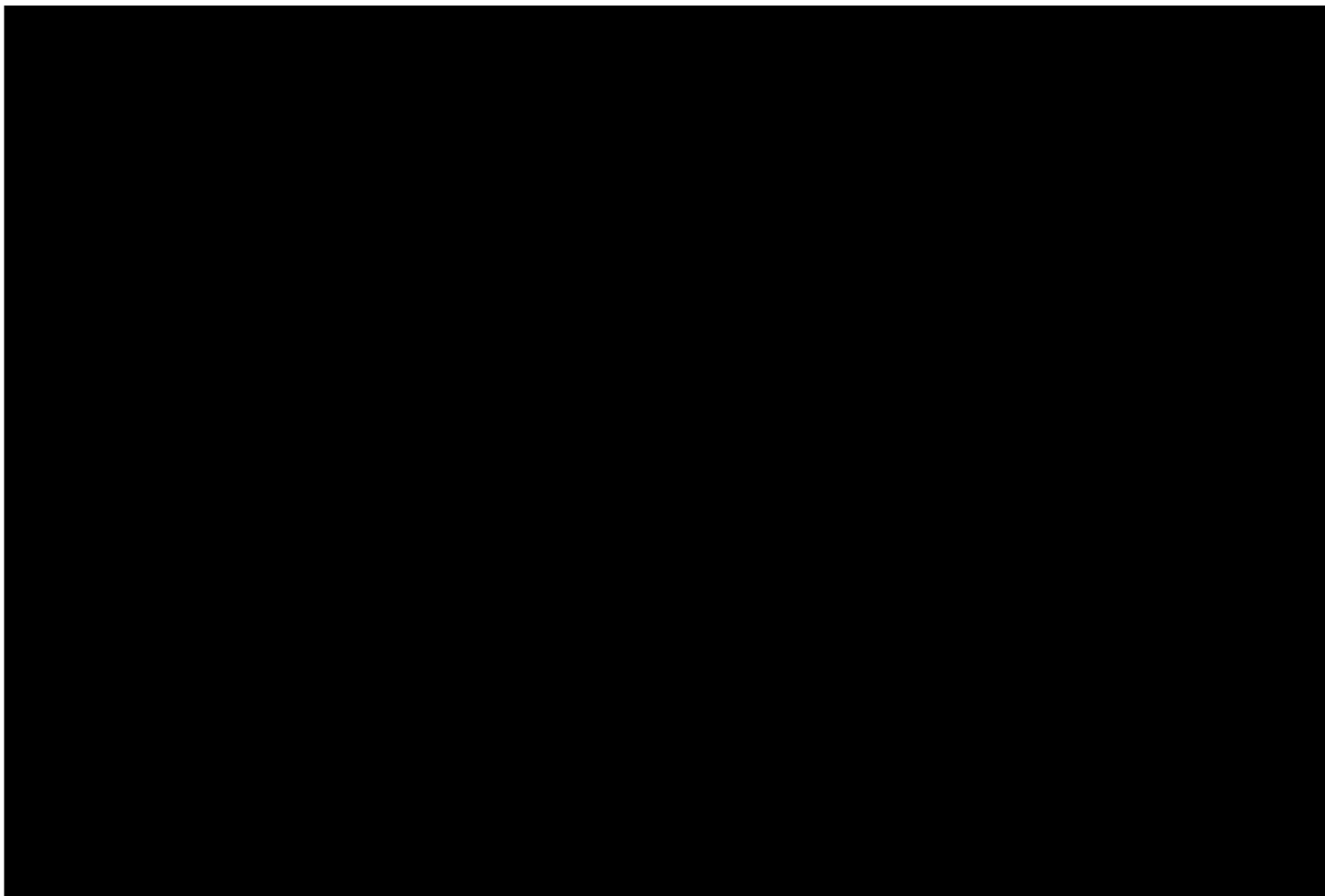
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Drug Enforcement Administration

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. [REDACTED]	2. G-DEP Identifier [REDACTED]
	3. File Title PUBLIX SUPERMARKETS, INC.	
4. Page 19 of 19		
5. Program Code	6. Date Prepared 05-15-2017	



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